

**REMARKS**

In response to the Office Action dated August 5, 2004, Applicant respectfully requests reconsideration and withdrawal of the rejection of the claims.

Claims 1-21 were rejected under 35 U.S.C. §103, on the grounds that they were considered to be unpatentable in view of the Anand et al patent (U.S. 6,748,436). It is respectfully submitted, however, that the Anand patent does not suggest the claimed subject matter to a person of ordinary skill in the art.

Claim 1 recites a uniform interface for configuring and managing a plurality of different types of network devices. As described in the specification, examples of network devices include switches, firewalls, routers and load balancers.

The claimed interface comprises two elements, namely a library containing generic commands that can be applied to the network devices, and a plurality of plug-in modules that can register with the library. Each of the plug-in modules operates to convert at least some of the generic commands into device-specific commands and to transmit these device-specific commands to individual devices of a type that are associated with the module.

In connection with the claimed library, the Office Action refers to the library 172B illustrated in Figure 1A of the Anand patent. Then, in connection with the claimed plug-in modules, the Office Action refers to the DLL modules that convert or map and correlate a generic command to a specific-platform command. However, the DLL modules are the same as the library 172B. For instance, at column 6, lines 32-35, the Anand patent states, "Furthermore, deployment servers 150A, 150B and 150C are respectively coupled to

libraries 172A, 172B, and 172C (*such as dynamic link libraries (DLLs)*)..." (emphasis added). In other words, the DLLs constitute the library 172B.

As such, the library 172B which comprises the DLLs cannot be interpreted to be *both* the claimed library containing generic commands *and* a plurality of plug-in modules that can register with such a library. The DLLs are not plug-in modules that register with themselves. Accordingly, they cannot suggest the claimed combination of elements.

The reason that the Anand patent does not suggest the claimed invention is due to the fact that it is directed to a different objective from the present invention. As noted in the background portion of the application, the present invention is directed to the automated deployment and management of network devices, such as switches, routers, firewalls, load balancers, and the like. In contrast, the Anand patent is directed to a network of deployment servers. The significance of this difference lies in the fact that a server has the ability to execute non-native code, such as an agent. In contrast, the proprietary operating systems that are typically associated with network devices do not facilitate the ability to run such code on the network devices.

As a result of this difference, the two systems operate in different manners. In the Anand system, the *generic* command is sent from the configuration server 118 to the remote deployment servers 150. The deployment servers access local libraries 172, to transform the generic command into a platform-specific command. This operation is due to the ability of the servers to run code that performs the transformation. In contrast, in the system of the present invention, the generic commands are first transformed into device-specific commands *at the interface*, and are then transmitted to the remote network devices. Due to the inability to run code on network devices, they are not able to accept a generic

command, and then convert it into a device-specific command, as in the servers of the Anand patent. For this reason, therefore, the conversion takes place *before* the command is sent to the network device.

In summary, therefore, the present invention provides an arrangement in which a generic command is converted into a device-specific command *at the interface*, and then transmitted to a remote network device. In the system of the Anand patent, the interface transmits a *generic* command to the remote deployment server, where it is then locally converted into a platform-specific command. For at least these reasons, therefore, it is respectfully submitted that the Anand patent does not suggest the claimed subject matter to a person of ordinary skill in the art.

A number of other distinguishing features are recited in the various dependent claims. For example, claim 2 recites that the plug-in modules transmit each of the commands in accordance with a transmission protocol that is specific to the individual devices, and claim 3 recites that one of these transmission protocols comprises Telnet.

The Office Action summarily dismisses the elements of all of the dependent claims as "obvious variations" of the teachings of the Anand patent. It is respectfully submitted that, due to the differences identified above, the features recited in the dependent claims cannot be considered to be mere obvious variants. For example, since the Anand patent does not relate to the transmission of commands to different types of network devices, it does not describe the need to utilize different transmission protocols that are specific to those devices. In particular, it does not pertain to the use of Telnet.


For similar reasons, it is respectfully submitted that the features recited in the other dependent claims are likewise not suggested by the Anand patent.

In view of the foregoing, it is respectfully submitted that all pending claims are allowable over the Anand patent. Reconsideration and withdrawal of the rejection is respectfully requested.

Respectfully submitted,

BURNS, DOANE, SWECKER & MATHIS, L.L.P.

Date: February 7, 2005

By:   
James A. LaBarre  
Registration No. 28,632

P.O. Box 1404  
Alexandria, Virginia 22313-1404  
(703) 836-6620